



Jannine Jennings

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cc:

Subject: Definition and Resolution of Temp TMDL Issues

Christine requested a quick update on the outstanding issues that we are dealing with in the Columbia River Temperature TMDL. So I took a few moments to expand on the issues raised at our July 25 meeting with the states and the potential resolution or pathway towards resolution for these issues. My grasp of where we are at are reflected below - taking off from Mary Lou's meeting notes. I hope I have represented those and subsequent discussions accurately.

Jannine

Outstanding Issues on Columbia River Temperature TMDL (black) & Proposed Resolutions (blue)

Idaho:

1. Section 3.3 - Use of Daily x-section average temperature. How does a target daily average T of 20°C comply with a water quality criterion of 20°C a daily maximum?

Rick will add additional explanation to the text, including some graphics showing how attaining daily average will also attain daily max and illustrating the daily variation in the current river compared to the pre-dammed river

2. Section 3.1 - excluding Dworshak releases for only 91-99 falls short of estimating natural temperatures as Clearwater River water T has been depressed since Dworshak began storing water in 1972. (a big issue for Potlatch)

Rick will add additional language to the text further explaining how the boundary conditions were determined and why the application of same principles to Clearwater is reasonable. Also will review explanation pertaining to Clearwater and add language regarding how Dworshak has cooled the river instead of warming it as is the case with most other tributaries. Will review use of language submitted by Don.

3. A DELTA T (incremental T increase) should be target, not specific temperatures - using delta T reduces arguments about whether we have site potential right and focuses in on effect of each facility neither penalizing them for upstream warming or letting them off the hook for upstream cooling. In addition, it appears to be more understandable to public and consistent with ID/OR presentation in SR/HC TMDL.

Rick will review language regarding measures in which TMDL elements are presented and add language which more fully explain the alternate expressions of the dam allocations (temp improvements needed at each dam & temp differences between successive target sites). Language will also be added that better explains that various expressions of the allocations may be appropriate for different uses and in differing situations.

Washington:

4. Canada water temperatures - how would changes affect TMDL? Recommend add language to TMDL to address this more fully.

No discussion or commitment to date

5. Target needed for mid-Lake FDR

a. Rick will add language recommending that monitoring at Grand Coulee Dam reflect both the temperature in the tailrace and the temperature in the lake. This will also note that a current data gap is more detailed modeling of the lake system and that, if in the future such work is done, that the TMDL can be reviewed and modified as appropriate.

b. Rick will add language in the beginning of the TMDL which notes that this TMDL addresses the major sources of thermal loading to the system yet acknowledges that there are details which can not currently be incorporated due to lack of information, studies, more detailed modeling etc. However, note that there is enough information present that proceeding in addressing these sources is reasonable and that available data provides for an adequate analysis to issue this TMDL. Also note that as further information and study results become available, that these can be considered and, as appropriate, the TMDL revised.

6. Should TMDL address compliance measures, like assessment, to 30 year mean?

No discussion to date

7. Limit TMDL compliance to critical period (late summer/fall) (Oregon too)

No discussion to date.

Jannine's suggested edits provide some additional language to why TMDL applies year-round. More discussion needed with States.

8. Should dams with smallest impacts get an allocation? Is there any room to adjust allocations so that some small impact dams don't need to reduce any? How do we address PUD dams for which WA must issue 401 Certifications? Rick had some ideas. Mike Herold (WA) was going to explore some. It was suggested at 7-25 meeting that it may be possible to run some additional modeling scenarios.
Next steps?

Presentation of Wasteload Allocations and Management of group Wasteload allocations -

what should be in the text and what should be in the implementation plan?

What additional language is needed to guide future permit writers?

Some of the numbers for the large WA dischargers need adjusted downward.

Should group WLAs be divided between WA and OR?

Mike Herold to review WA permit numbers and provide info to Rick.

Decision reached that WA and OR group allocations should be 2 separate allocations in TMDL with each state responsible for administering it's own group.

Document needs to be modified to reflect 2 group allocations (WA and OR)

Oregon working on internal process for management of bubble and may present EPA with some suggested language or edits for TMDL by Aug 10.

Decision needed on how much to put in TMDL vs implementation plan. Mike Herold working on first draft of the implementation plan.

General Permits (MS4, industrial stormwater, gravel operations, hatcheries, boat yards) currently not addressed in TMDL.

Mike Herold is reviewing permits to get an estimate of source size and temperatures and supply info to Jannine.

Jannine to brainstorm on potential approaches to address.

There should be some extra room in the group allocation for future small dischargers in the group allocation?

Rick wrote up

Wasteload allocation section should include Bob's graphic which shows size difference between the group dischargers and the dischargers with individual allocations. Additional text should be added to better state why this division is reasonable.
Rick to add?

The reach which has no additional capacity for point sources (proposes future growth allocation) is in the same area where growth is most likely to occur. Is there any way adjustments could be made to rectify this?

How will the group WLA be tracked. Add language which recommends that both states and EPA permits groups develop a tracking system to account for distribution of group allocation.

Strengthen wording in WLA section regarding ways in which WLA may be decreased during permitting process - near field analysis and technology requirements.

Oregon:

9. Remove references to climate change and global warming (without a big discussion)

Rick to remove these from document

Potential Time Killer Issues! *Rick*

1. General Permits - *Jannine* will propose some alternatives/options *Rick*
2. Refine temp loading numbers for big point source? Mike and Bob
3. Should the WLA for facilities with permits but currently not discharging be zero? Mike and Russell
4. Draft summary implementation strategy - Mike (w/OR, ID, CT, ST)
5. NMFS Consultation - Mary Lou to set up meeting with NMFS and FWS for late Aug, Jannine to revise BE prior to meeting
6. ID issues: needs a conference call - Rick and states (Don, Bob and Paul) done

States to provide comments and suggested edits to Rick by August 9

A couple additional questions from Jannine:

Is EPA permits group ok with what has been put forth for point sources, especially with regards to the Potlatch permit and Idaho/tribal/federal discharges for which we issue permits?

Do we need to do a briefing of our managers prior to releasing a draft to the public for informal review? Are they all on board with the distribution of allocations - point sources and tributaries at current load, dams need to reduce to site potential temperature?

Remember the following Conference calls:

August 15, 1:30 pm (PST) - Larger state/tribal/EPA group - ML will get number. Status report on edits/changes/progress. Decision on whether ready for Sept 1 release.

Monthly Meeting - August 22 afternoon dedicated to temperature TMDL

CRITFC Meeting - August 23